

# Exhibit V

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

MDL No. 16-2738 (FLW) (LHG)

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY LITIGATION

The remote video deposition of WILLIAM LONGO, Ph.D., taken via Zoom videoconference on May 2, 2024, commencing at approximately 11:20 a.m., before Lois Anne Robinson, Certified Realtime Reporter.

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1 Q All right. Looking at request 31 in  
2 what we marked as Exhibit 6, it asks for all  
3 standard operating procedures (SOPs) maintained  
4 by your laboratory for testing bulk materials for  
5 asbestos by PLM, TEM, and SEM.

6 And, Doctor, my question to you is:  
7 Does MAS maintain any standard operating  
8 procedures for the testing of talc samples by PLM  
9 for the presence of chrysotile?

10 A No. We haven't finished the standard  
11 operating procedures because we keep doing  
12 research and changing slight -- slight  
13 conditions, so -- until we finally have.

14 But what I may -- but what we do  
15 provide, in every analysis we do have chrysotile  
16 has materials and methods section that anybody  
17 can follow, and it doesn't really have --

18 If we had written SOPs for every time  
19 we made a change, it wouldn't really change  
20 any -- it -- you know, it really wouldn't give  
21 any additional information. That's why I think  
22 we're one of the few laboratories, when they do  
23 an analysis, they actually put in every step they  
24 do. And for any changes, then we, you know, show

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1 asbestos, and talked about heavy liquid density  
2 separation and so many top plates, et cetera,  
3 et cetera, plus that.

4 And, again, the CSM method, not a Longo  
5 method -- this is the Colorado School of Mines  
6 method, and they showed positive results. But  
7 the analysis is a lot the same, because they're  
8 basing their chrysotile identification on the  
9 refractive indices of the product. They're doing  
10 PLM on it and they're doing -- they're developing  
11 refractive indices for the analysis.

12 So, no. Has it been published in the  
13 peer-reviewed literature? In my opinion, it  
14 probably would have if it wasn't deep-sixed, in  
15 my opinion, by Johnson & Johnson.

16 Q Do you have any basis --

17 Well, are you willing to testify, to a  
18 reasonable degree of scientific certainty, that  
19 the Colorado School of Mines' PLM chrysotile  
20 heavy density liquid separation analysis was not  
21 published because of actions taken by  
22 Johnson & Johnson?

23 A You know, you have a good point. I  
24 don't know if Johnson & Johnson would have

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1 preparation is everything for a TEM analysis.

2 Q Well, if you are correct, the  
3 finding --

4 Withdrawn.

5 If MAS is correctly finding chrysotile  
6 in Johnson & Johnson talc using PLM, then you  
7 should be able to identify that on TEM if you  
8 look long enough. Correct?

9 A If -- if you look long enough,  
10 et cetera. That -- it doesn't work. You need,  
11 you know, you need to have the methodology down.  
12 And, again, once you say it's there by PLM,  
13 you're not required to do anything else. We are  
14 gonna do something else so I can publish it.

15 Q Why do you feel like --

16 Well, what else are you going to do?

17 A Well, we'll get to where --

18 If I'm gonna publish this, I want to  
19 publish and say this is the best, most efficient  
20 method we found, and these are the reasons why.

21 Q And what do you have to do before you  
22 get to that point in time?

23 A Well, I've got to finish up these --  
24 I've got to finish up using the 1.560. You know,

1 there's eight -- seven or eight samples there.  
2 Each of those are gonna take hours so that I have  
3 validated the concentrations by PLM. Then we  
4 have to go back and redo the TEMs because we're  
5 using 1.560. And we may adjust the heavy liquid  
6 density a little bit more, and that's it. But  
7 that's -- you're talking months of work.

8 Q Have --

9 Am I correct that you have not analyzed  
10 any of the MDL samples by PLM for the presence of  
11 chrysotile?

12 A That's correct. We have not.

13 Q Why not?

14 A Number one, we weren't asked to do it.

15 Number 2, we analyzed -- we have  
16 analyzed some -- you know, we have analyzed a  
17 number of samples from Vermont. We've analyzed a  
18 lot of samples from Italian, but not just -- not  
19 just Johnson Baby Powder samples.

20 So we never -- we never did it because  
21 we were doing it on a bunch of other things.  
22 And, you know, quite frankly, J&J was in  
23 bankruptcy, so we focused in on other  
24 manufacturers that were using, you know, using

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1 thousands of experts that are all involved in  
2 this. There's like, what, six? Five?

3 And I'm not saying they're incompetent.  
4 I just don't understand how they can miss the  
5 birefringence on chryso- -- on talc versus the  
6 chrysotile. You're talking about five orders of  
7 magnitude difference. Yeah, you'll get a yellow  
8 gold, but it's bright versus a more muted yellow  
9 gold. And you look at your data, and nobody's  
10 been able to explain where I have intergrowths  
11 with both talc and chrysotile in both parallel  
12 and perpendicular direction. And when you look  
13 at them, it's very obviously there's something  
14 different there.

15 MR. EWALD:

16 Q Well, you talked about in this  
17 litigation. But would you agree with me that  
18 submitting your methods, the scrutiny of the  
19 larger scientific community is a component of  
20 good science?

21 MS. O'DELL:

22 Object to the form.

23 A No, I won't agree with you. I would  
24 agree --

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1 C E R T I F I C A T E  
23 I do hereby certify that the above and  
4 foregoing transcript of proceedings in the matter  
5 aforementioned was taken down by me in machine  
6 shorthand, and the questions and answers thereto  
7 were reduced to writing under my personal  
8 supervision, and that the foregoing represents a  
9 true and correct transcript of the proceedings  
10 given by said witness upon said hearing.11 I further certify that I am neither of  
12 counsel nor of kin to the parties to the action,  
13 nor am I in anywise interested in the result of  
14 said cause.

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18 /s:// Lois Anne Robinson

19 LOIS ANNE ROBINSON, RPR, RMR

20 REGISTERED DIPLOMATE REPORTER

21 CERTIFIED REALTIME REPORTER

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